

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X	:	
M WAIKIKI LLC,	:	
	:	
Plaintiff,	:	Case No.: 11-CV-6488(BSJ)
	:	
-v-	:	
	:	
MARRIOTT HOTEL SERVICES, INC.,	:	
I.S. INTERNATIONAL, INC. and IAN SCHRAGER,	:	
	:	
Defendants.	:	
-----X	:	
	:	
MARRIOTT HOTEL SERVICES, INC.,	:	
	:	
Counterclaim Plaintiff,	:	
	:	
-v-	:	
	:	
M WAIKIKI LLC,	:	
	:	
Counterclaim Defendant.	:	
-----X	:	

**NOTICE OF MOTION TO TRANSFER VENUE**

**PLEASE TAKE NOTICE** that, upon the annexed Declaration of Damian McKinney, dated October 8, 2011, and the exhibits annexed thereto, the accompanying memorandum of law and all prior pleadings and proceedings heretofore had herein, Plaintiff M Waikiki LLC, by its undersigned attorneys, moves this Court for an order, pursuant to 28 U.S.C. § 1404(a), transferring the above-captioned action to the United States District Court for the District of Hawaii.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, any

opposing affidavits and answering memoranda must be served within fourteen (14) days after service of the moving papers.

Dated: New York, New York  
October 8, 2011

Respectfully submitted,

**BICKEL & BREWER**

/s/ Alexander D. Widell  
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